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Attorney for Defendant
JOSE LUIS RAMOS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:21-cr-00225-WBS
)	
Plaintiff,)	STIPULATION FOR MODIFICATION OF
)	CONDITIONS OF PRETRIAL RELEASE;
vs.)	PROPOSED ORDER
)	
JOSE LUIS RAMOS,)	Hon. Jeremy D. Peterson
)	
Defendant.)	
)	
)	

The defendant, JOSE LUIS RAMOS, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Cameron Desmond, hereby stipulate to and request an order from this Court modifying the conditions of Mr. Ramos' pretrial release to extend the curfew hours for employment purposes. The proposed amended special conditions of pretrial release file with this stipulation as Exhibit A include the requested amendment to Special Condition 14: extending the non-curfew hours by one hour in the morning and one hour in the evening.

Mr. Ramos has been on pretrial release in this district since December 2022, on a \$50,000 unsecured appearance bond. *See* Dkt. 82. Mr. Ramos is in compliance with all of his conditions of release. One of those conditions of release is location monitoring. Mr. Ramos is currently subject to a curfew between the hours of 8:00 p.m. and 6:00 a.m., and therefore must remain inside his residence during that time except for pre-approved employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court

appearances; court ordered obligations; or other activities authorized by the pretrial services officer.

Mr. Ramos's is currently employed through a local union and anticipates needing an extension of his curfew hours to accommodate an earlier start time and later workday end time depending on the nature of his work assignments, which vary. In light of Mr. Ramos' history of compliance with all of his conditions and the reduced assessment of flight risk and/or danger in this case, the parties request that **Special Condition 14 be modified to a curfew from 9:00 p.m. to 5:00 a.m., daily.** The parties do not request a hearing in this matter in light of this stipulation.

Respectfully submitted,

DATED: March 3, 2023

HEATHER E. WILLIAMS
Federal Defender

/s/ Megan T. Hopkins
MEGAN T. HOPKINS
Assistant Federal Defender
Attorney for JOSE LUIS RAMOS

DATED: March 3, 2023


PHILLIP A. TALBERT
United States Attorney

/s/ Cameron Desmond
CAMERON DESMOND
Assistant United States Attorney
Attorney for the United States

~~PROPOSED~~ ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Amended Special Conditions of Release for defendant, Jose Luis Ramos, are hereby adopted. Special Condition 14 shall be modified to reflect that Mr. Ramos shall be subject to a curfew from 9:00 p.m. to 5:00 a.m., daily. All other conditions of pretrial release shall remain in force.

DATED: March 3, 2023


HON. JEREMY D. PETERSON
United States Magistrate Judge